

#### REMARKS

Claims remaining in the present patent application are numbered 1-26. The rejections and comments of the Examiner set forth in the Office Action dated April 26, 2006 have been carefully considered by the Applicants. Applicants respectfully request the Examiner to consider and allow the remaining claims.

#### Office Notes

The present Office Action states that the RCE filed 12/15/2005 is considered improper because prosecution in the application was not closed at the time of the filing of the RCE. It was noted that the Office Action mailed 11/28/2005 placed the application in a non-final status.

Applicants respectfully submit that the RCE filed on 12/15/2005 was filed prior to the Applicants receiving the non-final Office Action mailed 11/28/2005. Specifically, the RCE filed on 12/15/2005 was diligently filed after filing the after final response of 10/12/2005 and prior to the Application being abandoned. The Applicants regret any confusion in the matter of the responses passing in the mail.

#### Specification

The present Office Action is objected to because a federally sponsored research and development statement, as set forth in MPEP 310, appears to be necessary. Applicants have reviewed MPEP 310 and the Examiner's

objection. Applicants respectfully submit that there was no federally sponsored research and development. As such, no Federal statement is necessary and the objection is moot.

35 U.S.C. §103(a) Rejection

The present Office Action rejected Claims 1, 3-4, and 10-16 under 35 U.S.C. 103(a) as being unpatentable over Hong Su et al. ("Identification of Syntactically Similar DTD Elements for Schema Matching", The Second International Conference on Web-Age Information Management (Waim 2001), Xi'an, China, July 2001, pp. 1-13, hereafter referred to as "SchemaMatching.") in view of Hong Su et al. ("XEM: Managing the Evolution of XML documents", Eleventh International Workshop on Research Issues in Data Engineering (RIDE 2001), Heidelberg, Germany, April 1-2, 2001, pp. 1-8, hereafter referred to as "XEM"). Applicants have reviewed the above cited references and respectfully submit that the present invention as recited in Claims 1, 3-4, and 10-16, are not rendered obvious over SchemaMatching in view of XEM.

Independent Claims 1 and 10

Applicants respectfully point out that independent Claims 1 and 10 each recite that the present invention includes methods for document transformation.

Specifically, independent Claim 1 recites, in part:

[A] method of document transformation comprising:  
a) modeling a source XML document corresponding to a source schema as a source tree having a plurality of source nodes;  
b) modeling a target XML document corresponding to a target schema as a target tree having a plurality of target nodes; and  
c) generating a sequence of transformation operations that transforms said source tree to said target tree.

Additionally, independent Claim 10 recites, in part:

[A]method of document transformation comprising:  
a) modeling a source schema of XML and a target schema of XML as a tree structure creating a source tree and a target tree, said source tree having a plurality of source nodes, said target tree having a plurality of target nodes; and  
b) generating a sequence of transformation operations that transforms said source XML document to said target XML document, wherein said plurality of source nodes of said source schema are matched and transformed to said plurality of target nodes in said target schema.

The present invention pertains to methods and systems for document transformation between a source XML schema and a target XML schema. In particular, independent Claims 1, and 10 recite that a sequence of transformation operations are generated that transforms a source tree representing a source XML document to a target tree representing a target XML document, or transforming a source XML document to a target XML document.

Applicants respectfully note that the use of the prior art references, SchemaMatching in view of XEM is improper for teaching or suggesting the present methods for document transformation between a source XML schema and a target XML schema, as claimed in independent Claims 1 and 10 of the present invention.

Specifically, Applicants hereby respectfully assert that the cited references, e.g., SchemaMatching and XEM, are prior art under 102(e). Moreover, the disclosure relied on is Applicant's own work. Thus, according to MPEP 2136.01 and *In re Mathews*, 408 F.2d 1393, 161 USPQ 276 (CCPA 1969), the relevant disclosure is the Applicant's own work and is disqualified as prior art under 102(e). In particular, Applicants respectfully assert that the present invention and the cited references are the work of Hong Su.

Applicants respectfully assert that the present Application was filed prior to the one year 102 bar date of the references. That is, the present Application was filed on March 04, 2001 which is within the year bar date of Applicant's own work which is cited as SchemaMatching and XEM.

For this reason, the references SchemaMatching and XEM are disqualified under 35 U.S.C. §102(e) as being Applicant's own work.

Accordingly, the present invention as recited in Claims 1 and 10 is neither taught nor rendered obvious by the now disqualified SchemaMatching and XEM references.

As such, the present invention as recited in Claims 1 and 10 is in a condition for allowance. In addition, Applicants respectfully submit that Claims 2-9 which depend from independent Claim 1 are also in a condition for allowance as being dependent on an allowable base claim. Also, Applicants respectfully submit that Claims 11-17 which depend from independent Claim 10 are also in a condition for allowance as being dependent on an allowable base claim.

#### Claims 2 and 17-21

In the Office Action, the Examiner rejects Claims 2 and 17-21 under 35 U.S.C. §103(a) as being unpatentable over SchemaMatching in view of XEM and further in view of Swamy et al. (6874141) hereinafter "Swamy". Applicants have reviewed the above cited references and respectfully submit that the present invention as recited in Claims 2 and 17-21, are not rendered obvious over SchemaMatching in view of XEM and further in view of Swamy.

#### Independent Claim 18

Applicants respectfully point out that independent Claim 18 recites that the present invention includes methods for document transformation.

Specifically, independent Claim 18, recites, in part:

[A] method of document transformation comprising:  
a) modeling a source XML document corresponding to a source schema as a source tree having a plurality of source nodes;  
b) modeling a target XML document corresponding to a target schema as a target tree having a plurality of target nodes; and  
c) generating a sequence of transformation operations that transforms said source tree to said target tree.

The present invention pertains to methods and systems for document transformation between a source XML schema and a target XML schema. In particular, independent Claim 18 recites that a sequence of transformation operations are generated that transforms a source tree representing a source XML document to a target tree representing a target XML document, or transforming a source XML document to a target XML document.

For the reasons provided herein and not repeated for purposes of brevity and clarity, Applicants respectfully submit that the SchemaMatching and XEM references are disqualified under MPEP 2136.05 the disclosure relied on is Applicant's own work.

In addition, Swamy does not overcome the shortcomings of the disqualified references. For this reason, Applicants respectfully submit that the features

of Claim 18 are not taught or rendered obvious in view of the disqualified references and Swamy. For this reason, Applicants respectfully submit that Claim 18 overcomes the rejection under 35 U.S.C. §103(a) and is allowable.

Further, Applicants respectfully submit that Claims 19-26 which depend from independent Claim 18 are also in a condition for allowance as being dependent on an allowable base claim.

Additionally, Applicants respectfully submit that Claim 2 which depends from independent Claim 1, and Claim 17 which depends from independent Claim 10 are also in condition for allowance as being dependent on allowable base claims.

#### Claims 5-9

In the Office Action, the Examiner rejects Claims 5-9 under 35 U.S.C. §103(a) as being unpatentable over SchemaMatching in view of XEM and further in view of Peter Buneman et al. ("UnQl: A Query Language and Algebra for SemiStructured Data Based on Structural Recursion", The VDLB Journal, issue No. 9, Springer-Verlag, (c) 2000, pp. 76-110, hereinafter referred to as "Buneman". Applicants have reviewed the above cited references and respectfully submit that the present invention as recited in Claims 5-9, are not rendered obvious over SchemaMatching in view of XEM and further in view of Buneman.

For the reasons provided herein and not repeated for purposes of brevity and clarity, Applicants respectfully submit that the SchemaMatching and XEM references are disqualified under MPEP 2136.05 the disclosure relied on is Applicant's own work.

In addition, Buneman does not overcome the shortcomings of the disqualified references. For this reason, Applicants respectfully submit that the features of independent Claim 1 are not taught or rendered obvious in view of the disqualified references and Buneman. For this reason, Applicants respectfully submit that Claim 1 overcomes the rejection under 35 U.S.C. §103(a) and is allowable.

Further, Applicants respectfully submit that Claims 5-9 which depend from independent Claim 1 are also in a condition for allowance as being dependent on an allowable base claim.

#### Claims 22-26

In the Office Action, the Examiner rejects Claims 22-26 under 35 U.S.C. §103(a) as being unpatentable over SchemaMatching in view of XEM and further in view of Swamy and Buneman. Applicants have reviewed the above cited references and respectfully submit that the present invention as recited in Claims 22-26, are not rendered



obvious over SchemaMatching in view of XEM and further in view of Swamy and Buneman.

For the reasons provided herein and not repeated for purposes of brevity and clarity, Applicants respectfully submit that the SchemaMatching and XEM references are disqualified under MPEP 2136.05 the disclosure relied on is Applicant's own work.

In addition, Swamy and Buneman do not overcome the shortcomings of the disqualified references. For this reason, Applicants respectfully submit that the features of independent Claim 18 are not taught or rendered obvious in view of the disqualified references and Buneman. For this reason, Applicants respectfully submit that Claim 18 overcomes the rejection under 35 U.S.C. §103(a) and is allowable.

Further, Applicants respectfully submit that Claims 22-26 which depend from independent Claim 18 are also in a condition for allowance as being dependent on an allowable base claim.

CONCLUSION


In light of the amendments and arguments presented herein, Applicants respectfully request reconsideration of the rejected Claims for allowance thereof.

Based on the arguments presented above, Applicants respectfully assert that Claims 1-26 overcome the rejections of record. Therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,  
Wagner, Murabito & Hao LLP

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